

**IN THE UNITED STATES DISTRICT COURT FOR
THE DISTRICT OF DELAWARE**

CRYSTALLEX INTERNATIONAL
CORPORATION,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 17-mc-151-LPS

OI EUROPEAN GROUP B.V.,

Plaintiff,

v.

BOLIVARIAN REPUBLIC OF
VENEZUELA,

Defendant.

Case No. 19-mc-290-LPS

**OI EUROPEAN GROUP B.V. RESPONSE
TO THE VENEZUELA PARTIES' MOTION REQUESTING
ADJOURNMENT OF THE JULY 22, 2025 SALE HEARING**

OI European Group B.V. (“OIEG”) respectfully submits this response to the *Venezuela Parties’ Motion Requesting Adjournment of the July 22, 2025 Sale Hearing* [D.I. 1782] (the “Motion”), and states as follows:

While the Venezuela Parties describe their request as a modest adjustment to account for scheduling pressure, the proposed delay of the Sale Hearing to the week of September 2, 2025 is excessive – and it comes less than two weeks after the Venezuela Parties requested a shorter 21-day extension of the Topping Period. *See* D.I. 1757.

At the Venezuela Parties’ request, the Court has already extended the Topping Period to June 18, 2025 and adopted a revised schedule for the remainder of the sale process, culminating in a Sale Hearing on July 22, 2025. *See* D.I. 1779. The Venezuela Parties’ asserted need for more time is speculative and reflects a pattern of repeated last-minute filings and procedural piecemeal maneuvering. The current timeline already reflects adjustments made by the Court, and further delay risks undermining bidder confidence and prolonging a process that has already required significant time and resources.

Nonetheless, OIEG does not oppose a short adjournment so long as the adjournment is not excessive, is made in connection with an updated discovery and briefing schedule, and is not subject to subsequent extensions or adjournment without a significant showing for cause to do so.

Accordingly, OIEG respectfully requests that if the Court is inclined to adjourn the Sale Hearing, such adjournment be no more than three or four weeks (similar to the Topping Period extension), with corresponding updates to the recently entered discovery and briefing schedule.

Dated: June 5, 2025

MORGAN, LEWIS & BOCKIUS LLP

By: /s/ Jody C. Barillare

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